

# **EXHIBIT B**

**From:** Adam Slater <ASlater@mazieslater.com>  
**Sent:** Wednesday, August 7, 2019 4:20 PM  
**To:** Goldberg, Seth A.; Priselac, Jessica  
**Cc:** Daniel Nigh (dnigh@levinlaw.com); bvp@kirtlandpackard.com; Marlene Goldenberg; George T. Williamson; Conlee Whiteley; Christopher Geddis; Stanoch, David; Layne Hilton; Honik, Ruben  
**Subject:** Core Discovery

Hi Jessica and Seth:

I am writing in follow up to the discussions to date, and in follow up to the emails from the Court earlier today.

We can meet with you and the other lead attorneys for each defendant on Wednesday at 10 am to try to resolve any issues that remain open, before the 2 pm conference. If there are no issues or only a few by then, we can meet a little later, but I think it is incumbent on all of us to meet to the extent there are unresolved issues.

In an effort to move things forward and try to narrow the issues, please advise as to whether all defendants subject to the Core Discovery Order will agree to provide the following:

The corporate organization/hierarchy of each defendant, and to the extent a member of the organization has not produced documents, advise as to whether another member of the organization has possession, custody, or control of the documents.

A list of each ANDA prepared by each defendant for valsartan, including those that may have been rejected or withdrawn. To the extent an ANDA was not produced for any reason please identify the reason why, and any correspondence with the FDA in that regard.

A list of each manufacturing facility utilized by each defendant for the manufacture of valsartan, both for API manufacturing, and for finished drug manufacturing, and the time period for each.

A list of each testing facility that tested valsartan, including for impurities or contamination.

A list of every test and test result received from each testing facility, for each defendant's (or an affiliate or independent entity's) testing of valsartan.

Also, please advise as to whether defendants will agree to produce the categories of documents described in our July 17, 2019 email, in eCTD format

For any defendant that has not produced core discovery, please advise as to the reason.

I am not addressing the balance of the defendant by defendant issues described in our August 6, 2019 letter, and hope that each defendant will endeavor to produce the ordered discovery and to speak with us to the extent there is an issue that needs to be resolved.

Thank you,

Adam M. Slater

Certified as a Civil Trial Attorney  
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